

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	Civil Action No. 02- 140E
)	
REAL PROPERTY KNOWN AND)	
NUMBERED AS 332 PARADE)	
STREET, ERIE, PENNSYLVANIA 16507)	
including all improvements, fixtures,)	
and appurtenances thereto or therein.)	
)	
Defendant.)	

**JOINT MOTION TO CONVEY DEFENDANT
REAL PROPERTY TO ABN AMRO MORTGAGE GROUP, INC.**

AND NOW, come the United States of America and ABN AMRO Mortgage Group, Inc., by and through their respective counsel, and respectfully represent as follows:

1. The United States instituted this judicial forfeiture action against real property known and numbered as 332 Parade Street, Erie, PA, including all improvements, fixtures and appurtenances thereto or therein (the "Defendant Property") pursuant to 21 U.S.C. § 881(a)(7).

2. ABN AMRO Mortgage Group, Inc. holds a first mortgage against the Defendant Property and that, pursuant to its complaint in mortgage foreclosure filed with the Court of Common Pleas of Erie County, is owed \$37,897.93 plus interest and costs on its mortgage, and that its mortgage takes priority over all other mortgage and judgment creditors.

3. The United States has determined that there is insufficient equity in the Defendant Property to realize any monies to the United States after payment of the mortgage debt and costs of sale.

4. The United States will convey the property to ABN AMRO Mortgage Group, Inc. for consideration of its mortgage debt by quitclaim deed in the form attached hereto as Exhibit A. ABN AMRO Mortgage Group, Inc. will reimburse the United States Marshals Service for its arrest and seizure costs in connection with the Defendant Property which costs equal \$1,652.96 through June 30, 2005.

WHEREFORE, the United States of America and ABN AMRO Mortgage Group, Inc. respectfully request that the Court approve the conveyance of the Defendant Property to ABN AMRO Mortgage Group, Inc. as outlined herein.

Respectfully submitted,

Mary Beth Buchanan
United States Attorney

By:

Mary McKeen Houghton
Assistant U.S. Attorney
700 Grant Street, Suite 400
Pittsburgh, PA 15219
(412) 894-7370
PA ID #31929

Christopher DeNardo, Esquire
Attorney for ABN AMRO Mortgage Group, Inc.

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)	
Defendant.)	

ORDER OF COURT

AND NOW, in Pittsburgh, Pennsylvania, this _____ day of _____, 2005, it is hereby ORDERED, ADJUDGED, AND DECREED that foregoing Joint Motion be, and hereby is, approved. It is Ordered that the United States shall convey the Defendant Property to ABN AMRO Mortgage Group, Inc. for consideration of its mortgage debt by quitclaim deed in the form attached to the Joint Motion as Exhibit A. It is further Ordered that ABN AMRO Mortgage Group, Inc. reimburse the United States Marshals Service for its arrest and seizure costs, which costs equal \$1,652.96 through June 30, 2005.

United States District Court

EXHIBIT A

CERTIFICATE OF SERVICE

_____ I hereby certify that a true and correct copy of the within United States' Joint Motion was served by first class mail, postage prepaid, this _____ day of June, 2005 upon the following:

Christopher A. DeNardo, Esquire
Thomas I. Puleo, L.L.C.
660 Sentry Parkway, Suite 210
Blue Bell, Pennsylvania 19422
Attorney for ABN AMRO Mortgage Group, Inc.

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